



321 West 44th Street
Suite 1000
New York, NY 10036
(212) 850-6100 | Phone
(212) 850-6299 | Fax

Rachel F. Strom
(212) 850-6102
rstrom@lskslaw.com

March 13, 2017

VIA ECF AND FAX TO 718-613-2546

The Hon. Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Glen Craig v. Genius Media Group, Inc.*,
Case No. 1:17-cv-00983-NGG-RML**

Dear Judge Garaufis:


We represent Genius Media Group, Inc. (“Genius”) in the above-referenced matter. We write, pursuant to Rule II(E) of Your Honor’s Individual Rules, to request an extension of time to file an response to the Complaint. The Complaint was served on February 24, 2017, and Genius’s response is currently due on March 17, 2017.

The parties are currently in negotiations that could resolve this matter in its entirety. Consequently, Genius respectfully requests an extension of time of 31 days until April 17, 2017 to file its response to permit the parties to complete these efforts. No other requests for extensions or adjournments have previously been filed. Plaintiff’s counsel consents to this motion.

Thank you for your consideration.

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 
Rachel F. Strom

cc: Richard Liebowitz (by ECF)